

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

CASE NO.: 23-21512-CIV-ALTONAGA/Damian

LIDIA NOEMI ZALAZAR, an individual,  
Plaintiff,

-vs-

CAPITAL FORCE LLC, a Delaware limited  
liability company; CAPITAL FORCE F1 LLC,  
a Delaware limited liability; MATIAS  
COSTANTINI, an individual; JUAN CRUZ  
TALIA BROWN, an individual; JONATHAN  
CULLEY, an individual,

Defendants.

-----/

Duane Morris LLP  
201 South Biscayne Boulevard, Suite 3400  
Miami, Florida 33131  
Wednesday, June 26, 2024  
1:09 P.M. to 4:15 P.M.

DEPOSITION OF  
ANDRES INI  
CORPORATE REPRESENTATIVE FOR  
MELTORME, LLC

Taken before Jasmine Mercedes, Court Reporter,  
a Notary Public for the State of Florida at Large,  
pursuant to Notice of Taking Deposition filed in the  
above-styled cause.

1 APPEARANCES:

2 On Behalf of the Witness, Andres Ini, Corporate  
3 Representative for Meltorme, LLC:

4 VAZQUEZ & ASSOCIATES

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10 BY: GERARDO ALVARO VAZQUEZ, ESQ.

11

12 On Behalf of the Defendants, Matias Costantini,  
13 Juan Cruz Talia Brown, and Jonathan Culley:

14 DUANNE MORRIS LLP

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20 BY: PHILLIP M. HUDSON, III, ESQ.

21

22 Also Present:

23 Javier Aparisi-Winthuysen, Spanish Interpreter

24

25

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19 (Exhibits were retained by Mr. Hudson.)

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1 THEREUPON:

2 COURT REPORTER: Good afternoon, everyone. It  
3 is now 1:09 p.m. We are on the record.

4 And, sir, Interpreter, I'm going to swear you  
5 in first.

6 JAVIER APARISI-WINTHUYSEN,  
7 was duly sworn to truly and accurately  
8 translate the testimony from English to Spanish and  
9 Spanish to English.

10 COURT REPORTER: And for the record, I've  
11 already identified the witness for this deposition  
12 today, and I will swear in the witness.

13 ANDRES INI,  
14 having been first duly sworn and responding,  
15 "Yes, I swear," was examined and testified as  
16 follows:

17 MR. VAZQUEZ: Okay. Mr. Ini --

18 COURT REPORTER: Thank you.

19 MR. VAZQUEZ: -- let me -- let's set up  
20 something procedurally. Since we have an  
21 interpreter, and I -- listen to me one second --  
22 and I know that you understand some English, okay.  
23 We're either doing it in English, or we're doing it  
24 in Spanish. We're going to do it in Spanish.

25 THE WITNESS: In Spanish.

1 MR. VAZQUEZ: So even if you understand,  
2 please wait for the interpreter --

3 THE WITNESS: Perfect, perfect.

4 MR. VAZQUEZ: -- to provide -- okay.

5 THE WITNESS: Perfect.

6 MR. VAZQUEZ: Interpret what it is, and then  
7 respond.

8 THE WITNESS: Very clear to me.

9 COURT REPORTER: Okay. And if Counsel could  
10 please state their appearances for the record.

11 MR. VAZQUEZ: On behalf of Mr. Andres Ini,  
12 with the company, Meltorme, Gerardo Vazquez.

13 MR. HUDSON: Phillip Hudson of Duane Morris  
14 for Matias Costantini; Jon Culley, C-U-L-L-E-Y;  
15 Juan Cruz Talia Brown.

16 COURT REPORTER: Thank you.  
17 Counsel, whenever you're ready.

18 MR. HUDSON: Thank you.

19 DIRECT EXAMINATION

20 BY MR. HUDSON:

21 Q. Good afternoon, sir.

22 A. Thank you very much.

23 Q. So we're going to do this in Spanish, and  
24 we're going to use an interpreter. As your counsel  
25 indicated, we need to develop a rhythm where the three

1 of us communicate without speaking over one another.

2 A. Correct.

3 Q. This young lady is taking down everything that  
4 we say, and she cannot take down multiple people  
5 speaking at one time.

6 A. Correct.

7 Q. You don't want her mad at you.

8 A. Okay.

9 Q. Okay. Let's go. Please state, then spell  
10 your name.

11 A. Andres Ini. Andres, as in A-N-D-R-E-S, and  
12 Ini, as in I-N-I.

13 Q. Is that your legal name?

14 A. Yes.

15 Q. Where do you reside?

16 A. In Buenos Aires, Argentina.

17 Q. May I have your address, please?

18 A. Avenida Dorrego, as in A-V-E-N-I-D-A, Dorrego,  
19 D-O-R-R-E-G-O, 1869 Segundo, as in number 2 with a  
20 little O, P-I-S-O, F, Buenos Aires, Argentina.

21 Q. Is that a single-family home?

22 A. I live alone there.

23 Q. Is it a house or a condominium or an  
24 apartment?

25 A. It's a building that has several apartments,

1 and I live in one of the apartments.

2 Q. Do you own the apartment?

3 A. Yes.

4 Q. What is your citizenship status?

5 A. In Buenos Aires, legal.

6 Q. You're an Argentinian citizen?

7 A. Yes.

8 Q. Do you carry an Argentinian passport?

9 A. Yes.

10 Q. Do you have any citizenship status or  
11 residency status in the United States?

12 A. No.

13 Q. Have you ever sought any residency or  
14 citizenship status in the United States?

15 A. No.

16 Q. Do you have any desire to seek residency or  
17 citizenship status in the United States?

18 A. No.

19 Q. Do you have any assets in the United States?

20 A. No.

21 Q. Have you ever had any assets in the United  
22 States?

23 A. The 01 Visa, the -- the one for talent.

24 Q. Do you consider that an asset?

25 A. It's something good for me.

1 Q. Okay. When I asked you, do you have any  
2 assets in the U.S., what I meant was, do you have any  
3 real estate? Do you own any cars? That's what I mean  
4 by an asset.

5 A. Okay. Personally? No.

6 Q. In any fashion? Indirectly?

7 A. Through the company? Yes.

8 Q. Okay. What's the name of the company?

9 A. Meltorme, LLC.

10 Q. And what does Meltorme, LLC, own?

11 A. It's a one-one. I think that's what it's  
12 called. It's in a one-one apartment.

13 COURT REPORTER: May I have the spelling for  
14 the apartment? I mean, for the Tome? Meltorme.

15 MR. HUDSON: It's in the notice.

16 MR. VAZQUEZ: It's on the notice.

17 THE INTERPRETER: M-E-L-T-O-R-M-E. It's a  
18 famous entertainer.

19 MR. HUDSON: Well, I'm actually going to ask  
20 that question.

21 BY MR. HUDSON:

22 Q. Where did the name Meltorme come from?

23 A. My favorite movie.

24 Q. What's the movie?

25 A. Top secret.



1 Q. Do you know that there's a famous singer in  
2 the United States named Mel Torme?

3 A. Yes. I am a singer, and that's why I do.

4 Q. I was right. The young people don't know who  
5 Mel Torme is.

6 A. I have a -- a very old soul.

7 Q. Good. So do I. Okay. Who owns Meltorme?

8 A. My female cousin, Valeria Galante (phonetic).  
9 She's American. She's a citizen. And I, Andy, or  
10 Andres, Ini.

11 Q. You own 99 percent; she owns 1 percent?

12 A. Correct.

13 Q. And you opened that company in about January  
14 of 2020?

15 A. Exactly. Capital Force -- Capital Force  
16 opened it for me.

17 Q. Okay. Who at Capital Force opened it for you?

18 A. An employee by the name of Diego Gomez,  
19 together with the attorneys who were working there.

20 Q. Attorneys working where?

21 A. Well, according to Diego Gomez, the attorneys  
22 either for the company or attorneys who were advising  
23 the company were the ones in charge of opening the LLC.

24 Q. Was that Jennifer Snyder?

25 A. I don't know that. I only spoke with Diego

1 Gomez.

2 Q. Okay. How did you know Diego Gomez?

3 A. So that was back in 2016. When I met Diego, I  
4 did a show for his dad in Colonia, C-O-L-O-N-I-A,  
5 Uruguay. And at the time, the dad introduces me to  
6 Diego. He said that was his son who was living in the  
7 U.S. And because I was already set to go on vacation in  
8 Miami in January, he put me in contact with his son so I  
9 would have a friend here.

10 Q. The vacation was in 2016?

11 A. No. They were in 2017, but I met Diego in  
12 2016.

13 Q. Right. Did you meet him when you were in  
14 Miami on vacation in 2017?

15 A. I met him in 2016 at the event in Uruguay.

16 Q. Right. And then did you come to Miami in 2017  
17 on vacation?

18 A. Correct.

19 Q. Did you meet Diego in Miami when you were here  
20 on vacation?

21 A. We got together one time to eat something over  
22 at a Dennis restaurant.

23 MR. VAZQUEZ: Was it Denny's or Dennis?

24 BY MR. HUDSON:

25 Q. Spell it?

1           A.     The one that's cheap.   The one that's yellow  
2     and red, the one that gives you cholesterol.

3           MR. HUDSON:   And I think they have Mel Torme  
4     playing on the sound system.   I told you I was  
5     going to be a comedian.

6     BY MR. HUDSON:

7           Q.     When did you first speak to Diego Gomez about  
8     Capital Force?

9           A.     In 2017, when I asked him what he was doing  
10    here in Miami, and he said that he was working for this  
11    financial company.

12          Q.     And did he suggest in 2017 that you invest  
13    with him?

14          A.     Yes.   He told me to invest with him, but back  
15    then at that moment, I did not have money.

16          Q.     Did you ultimately invest with Diego's  
17    company?

18          MR. VAZQUEZ:   Okay.   Object as to form of the  
19    question.

20          MR. HUDSON:   You can answer.

21          MR. VAZQUEZ:   Once in a while I may object to  
22    something.   That does not mean that you don't have  
23    to answer.   It just -- you still have to answer the  
24    question.

25          THE WITNESS:   Well, what did my attorney just

1 say to me? He talked to me in English.

2 MR. HUDSON: Okay. Stop.

3 MR. VAZQUEZ: Go ahead.

4 BY MR. HUDSON:

5 Q. I'm going to do some ground rules, so we're  
6 all on the same page. Okay. Not your fault. It's our  
7 fault.

8 A. Yes. Okay.

9 Q. Have you ever been deposed before?

10 A. No.

11 Q. Okay. This is a deposition. This is what we  
12 call a deposition. So you're the witness, and I am  
13 deposing you which means I'm asking you questions. The  
14 reason I'm asking you questions is because you have sued  
15 my clients alleging that they defrauded you.

16 Are you aware of that?

17 A. Yes.

18 Q. Okay. In front of you have a binder that has  
19 a copy of the lawsuit where you are suing my clients.  
20 I'd like you to open it up. You can look through it,  
21 and tell me if you've ever seen it before.

22 A. Yes. It's in English.

23 Q. Do you read English?

24 A. I don't understand English very well. A few  
25 odds and ends that I can read to -- to get by. Is there

1 any segment here you'd like me to read?

2 Q. Not yet. I just want to know if you recognize  
3 that lawsuit that your lawyer filed on your behalf?

4 A. Of course.

5 MR. HUDSON: All right. So let's mark that  
6 binder as -- I don't remember what we are calling  
7 this.

8 Defendants. We'll mark them Defendants' with  
9 numbers. We'll mark this as Defendants' 1 for this  
10 depo.

11 (Thereupon, Defendants' Exhibit 1 was marked  
12 for identification.)

13 BY MR. HUDSON:

14 Q. Please hand me the binder. You'll get it  
15 back.

16 A. What is that ticket they're putting on it?

17 Q. It's so that when we use this -- if we use  
18 this deposition in court, we now know what it is you're  
19 looking at.

20 A. Okay.

21 Q. When this deposition is finished, she will  
22 send me, and she'll send your lawyer a copy we can read.  
23 And the exhibits will be attached.

24 A. Yes.

25 Q. So a deposition is when one of the parties --

1 any one of the parties can take a deposition. Asks the  
2 witnesses -- you're a witness. You're also a party for  
3 any factual information they have to support their  
4 claims in the lawsuit.

5 A. Very well.

6 Q. There's no judge here. There's no jury here.  
7 I'm not here to trick you. I'm not here to try to win  
8 my case today. I'm just here to get the facts that you  
9 have that support your position. If I ask you a  
10 question you don't understand, tell me you don't  
11 understand it, and I will ask it a different way.

12 A. Okay. Very well.

13 Q. I don't want you to guess, and your lawyer  
14 doesn't want you to guess. If you don't know the  
15 answer, just say, I don't know. If you don't remember  
16 the answer, just say, I don't remember. I may be able  
17 to show you something that will help your memory, I may  
18 not. You can take a break at any time, but if I have  
19 asked you a question, you must answer the question  
20 before you take a break.

21 A. All right.

22 Q. Because you do speak a little English, if you  
23 feel the interpreter has not correctly interpreted your  
24 answer, please let us know, and we'll try to work that  
25 out.

1 A. Very well.

2 Q. Okay. So let's keep going. What is your  
3 educational background?

4 A. I have an undergraduate degree in social  
5 communication. I graduated from the University of  
6 Buenos Aires. And I work in radio, television, and  
7 theater.

8 Q. What year were you born?

9 A. 1979.

10 Q. So once you graduated, what was your first  
11 job?

12 A. Television script writer.

13 Q. Okay. Since your first job, have all of your  
14 subsequent jobs been in the entertainment field?

15 A. No. I also was selling cloth. I was a  
16 textile salesperson.

17 Q. The warp and the woof. Tell me --

18 THE INTERPRETER: Jennifer is going to have  
19 difficulty with that.

20 MR. HUDSON: There may not be a translation.

21 THE INTERPRETER: Repeat.

22 BY MR. HUDSON:

23 Q. Does he know the word warp, W-A-R-P?

24 A. No.

25 Q. It's a type of weave for cloth. One direction

1 is the warp; one is the woof. You learn a lot in my  
2 business.

3 A. I was selling just plain cloth for pants and  
4 then finer cloth for the polo shirt and so on.

5 Q. Okay. How long did you do that?

6 A. I did it for three years.

7 Q. And then what did you do after that?

8 A. I started doing standup and radio.

9 Q. You think I have a chance?

10 A. As soon as I saw you, I realized that you  
11 would be an excellent partner.

12 Q. I'm the straight man.

13 A. I -- so on -- on -- when you have a dual with  
14 -- with two comedians, there's always one who's a  
15 serious guy and the other one who that -- makes the  
16 jokes.

17 Q. We call it the straight man. I'm the straight  
18 man.

19 A. If one day you want to leave your profession,  
20 I invite you to come to the theater with me.

21 Q. I'm Dean Martin. Do you know Dean Martin?

22 Okay. So once you started the comedy standup  
23 three years after the textile business, has every job  
24 been in the entertainment field since then?

25 A. Yes.



1 Q. Do you have -- other than this Capital Force  
2 transaction, do you have any other types of investments  
3 or situations where you have put money into hoping for a  
4 positive return?

5 A. No. No.

6 Q. Do you have a business manager?

7 A. No. No.

8 Q. Do you have an --

9 A. No. No.

10 Q. I'm sorry. When you talked about Meltorme,  
11 did you sell say Meltorme owned a one-bedroom apartment  
12 in Miami?

13 A. Yes. Because my female cousin does real  
14 estate.

15 Q. Okay. And that apartment has nothing to do  
16 with Capital Force, correct?

17 A. Nothing.

18 Q. Do you know who Jonathan Culley is?

19 A. He -- he worked for Capital Force.

20 Q. Have you ever met Jonathan Culley?

21 A. No. I only got together in person with Matias  
22 Costantini.

23 Q. And so do you know who Juan Cruz Talia Brown  
24 is?

25 A. I know he works over at Capital Force, but he

1 wasn't there at that meeting with Matias.

2 Q. So you've never met him before either,  
3 correct?

4 A. Well, both Juan and Jon, I -- I learned of  
5 them through conversations with Diego Gomez, but the  
6 only one who I ever met in person was Matias.

7 Q. Okay. Do you recall ever communicating in any  
8 other fashion, WhatsApp, e-mail, text, with Juan or Jon?

9 A. Only with Matias.

10 Q. So tell me when you first met Matias.

11 A. So I first met Matias in January of 2020 at --  
12 at his office on -- in Brickell, the Capital Force  
13 offices for Brickell. And he explained to me the  
14 investments, the returns, and the options were  
15 investments.

16 Q. And that's before you invested, correct?

17 A. At the same time.

18 Q. Okay. You should have exhibits toward the end  
19 of that document. It doesn't look like they're tabbed.  
20 Maybe your lawyer can help you.

21 MR. HUDSON: We're looking for Exhibits P, as  
22 in Paul, and Q. They're P and Q.

23 MR. VAZQUEZ: It's this document here towards  
24 the end.

25 THE INTERPRETER: We have P --

1 MR. VAZQUEZ: And I'm sorry, there's --

2 MR. HUDSON: There's two --

3 MR. VAZQUEZ: Oh, no. I apologize.

4 THE INTERPRETER: Interpreter has P here.

5 MR. VAZQUEZ: P. Yeah. Let's start with P.

6 THE INTERPRETER: P. Okay.

7 MR. VAZQUEZ: Here, do you want to put some  
8 stickers on those so you can find them easily?

9 THE INTERPRETER: I think that -- P.

10 BY MR. HUDSON:

11 Q. Okay. So what you're looking at is Exhibit P  
12 -- I'm sorry. Tab P to Exhibit 1 that we've marked in  
13 this deposition. Take a look at that document and tell  
14 me if you recognize it.

15 A. Should I read the whole thing?

16 Q. Whatever you need to do to recognize the  
17 document.

18 A. What should -- what -- what do I have to do  
19 with this?

20 Q. The first document is called Secured Fixed  
21 Interest Only Promissory Note. Do you agree with that?

22 A. Oh, a fixed -- a secured fixed interest?

23 Q. Well, I'm asking you: Do you agree that's what  
24 this document says?

25 MR. VAZQUEZ: Object just to the form of the

1 question.

2 You can answer.

3 THE WITNESS: Honestly, my English is not good  
4 enough to be able to respond to you, but I -- I can  
5 respond to you based on what I spoke with Matias.

6 BY MR. HUDSON:

7 Q. Okay. Well, let's keep going. This document  
8 says that Meltorme, LLC, is lending to one of the  
9 Capital Force entities, Capital Force, LLC, \$180,000.  
10 And under section 1, it says that Capital Force is to  
11 pay ten percent fixed interest to Meltorme on the loan.  
12 And above that, where it talks about Meltorme, it  
13 defines Meltorme as "lender".

14 So do you recall lending Capital Force  
15 \$180,000 in January of 2020?

16 A. I did not lend it to them, but rather I made  
17 an investment.

18 Q. Okay. Well, this document says that Meltorme  
19 loaned \$180,000. And if you look on Page 5 of that  
20 document, Meltorme signed the document, and it appears  
21 by Diego Gomez.

22 Do you see that?

23 A. Diego Gomez was their employee.

24 Q. I understand. The corporate records of the  
25 state of Florida show that Diego Gomez was a manager of

1 Meltorme. Do you know what that means?

2 A. From what I gather, he was on both sides of  
3 the counter.

4 Q. Do you dispute that Diego Gomez was a manager  
5 for Meltorme in January of 2020?

6 A. Well, he's the one who set up the company, and  
7 he put himself as a manager. But we never talked about  
8 a loan, but -- always of an investment.

9 Q. Okay. How many meetings did you have with  
10 Matias?

11 A. In person, I had one. Like I said before,  
12 around this time in January of 2020.

13 Q. Who else was in that meeting?

14 A. My girlfriend at the time.

15 Q. Anybody else?

16 A. Honestly, I don't remember whether or not  
17 Diego Gomez was there. I don't remember. He might have  
18 been.

19 Q. Did Diego Gomez give you any information about  
20 this opportunity?

21 A. Both Diego and Matias Costantini showed me a  
22 giant screen with a PowerPoint.

23 Q. This promissory note that we're looking at is  
24 attached to your lawsuit and is the basis for your  
25 lawsuit. So if you have any concerns with this

1 promissory note, whether it wasn't signed appropriately,  
2 you need to tell me what those concerns are today.

3 A. I don't understand the question.

4 Q. Okay. Your lawyer, by attaching this to your  
5 complaint, has taken the position that you're owed money  
6 consistent with this document, this note.

7 A. That's right.

8 Q. Okay. So you agree that this note is  
9 enforceable against Meltorme?

10 MR. VAZQUEZ: Object to the form of the  
11 question.

12 BY MR. HUDSON:

13 Q. You can answer.

14 A. I don't understand the question.

15 Q. Turn to the next Exhibit Q. This is a second  
16 secured fixed interest only promissory note. It's for  
17 \$150,000. It's dated January 24th, 2021. How much was  
18 your initial advance to the -- to Capital Force?

19 A. The previous one?

20 Q. 180,000.

21 A. Yes. But can I add something?

22 Q. You can ask. I may not answer it, but go  
23 ahead.

24 A. The first time I got together with Matias, he  
25 told me that the interest that I was going to get out of

1 my investment was going to be ten percent. I asked him,  
2 could it be 12 percent?

3 He told me that the only way to get a higher  
4 interest in, for example, 20 percent, was if I  
5 participated in the greatest -- greater profits and also  
6 the greater losses. And because I did not want to  
7 participate in the losses, I chose to go the safe route.

8 And that would've been ten percent without  
9 risk, according to Matias' words, nevertheless.  
10 Nevertheless, they lowered the interest rate to six  
11 percent, and then to eight percent. They never really  
12 fulfilled the set interest rate. All of only -- there  
13 were only two months when they were paying ten percent.

14 Q. Was there a time when you were given 30 -- you  
15 asked for and were given \$30,000 of your 180,000 back?

16 A. I wanted everything back. But what Diego  
17 Gomez told me, he -- he said that you had to follow the  
18 company and the capital of the investment that was made  
19 by the investors there so that it would not be lost to  
20 support the company, and that way we don't --would all  
21 be safe. And then that the main capital would not be  
22 lost. And for that reason, they could give me 30,000,  
23 and for me to keep on waiting and trusting that  
24 everything was going to turn out better.

25 Q. Okay. So you did receive 180, I'm sorry. You

1 did receive \$30,000 back, correct?

2 A. It was. And -- and they ended up owing me  
3 \$150,000?

4 Q. Correct. And that's probably why this second  
5 note was created, Exhibit Q.

6 A. That is what I'm claiming.

7 MR. HUDSON: Okay. Yeah.

8 MR. VAZQUEZ: Give me just a one-minute break.  
9 I'm going to go to the restroom.

10 THE WITNESS: Yeah. Yes, I am tired.

11 COURT REPORTER: Okay. Off the record. 1:57  
12 p.m.

13 (Off Record.)

14 COURT REPORTER: It is 2:06 p.m. We are back  
15 on the record.

16 BY MR. HUDSON:

17 Q. So according to your lawsuit, you borrowed,  
18 I'm sorry, you loaned Capital Force \$180,000, were  
19 repaid 30, and now you are owed \$150,000. Do you  
20 dispute that?

21 A. I'm going to make it more exact. In June of  
22 2022, when they said that they were going to be paying  
23 everything back little by little, I received a payment  
24 of \$1,500. That -- and then that wasn't interest, but  
25 rather part of the capital, according to them. So the



1 exact amount would be 148,500 to make everything very  
2 clear.

3 Q. Okay.

4 A. Yeah.

5 Q. The two promissory notes show that Capital  
6 Force, LLC, owes the money to Meltorme. Do you disagree  
7 with that?

8 A. They owe me money, correct.

9 Q. Capital Force, LLC, does?

10 A. They owe me money. 148,500, without taking  
11 into account the interest from January of 2022 to the  
12 present date.

13 Q. But my point is, you advanced money from and  
14 got an agreement to repay that money from Capital Force,  
15 not my three individual clients, correct?

16 A. There wasn't any repayment settlement. There  
17 wasn't any -- any proposal.

18 Q. Did Matias Costantini ever personally agree to  
19 repay you any money?

20 A. No.

21 Q. Did Juan Cruz Talia Brown ever agree to repay  
22 you any money?

23 A. I never actually spoke with Juan Cruz or Jon,  
24 but Matias in 2022 said that he was going to pay  
25 everyone. He wasn't going to leave anyone hanging.

1 Q. Do you believe that was Matias Costantini  
2 agreeing to pay you personally from his assets or to pay  
3 you back from Capital Force?

4 A. In the first meeting I had -- so -- so the --  
5 the first meeting, we had -- 80 percent of the time he  
6 spent the whole time saying -- showing off how rich he  
7 was. You know, he was one of the richest guys in  
8 Argentina. You know, they had a place in Key Biscayne,  
9 had a Ferrari, a yacht. And it was, you know, a wealthy  
10 family, a very well-known family name. And that family  
11 name was a guarantee.

12 Q. Okay. Let's do it this way. I need you to  
13 answer the next question yes or no. No explanation.  
14 Once you answer yes or no, then you can explain if you  
15 feel the need to explain.

16 A. Yes.

17 Q. Did Matias Costantini ever personally agree to  
18 repay you personally, the money that you loan to Capital  
19 Force, LLC?

20 A. He did not use the word "personally." The  
21 only thing he said was he was going to pay.

22 Q. I need you to answer the question yes or no.

23 MR. VAZQUEZ: Object to the form of the  
24 question.

25 BY MR. HUDSON:

1 Q. You can answer.

2 MR. HUDSON: That doesn't sound like a yes or  
3 no.

4 THE INTERPRETER: During 2022, he said he was  
5 going to pay.

6 MR. HUDSON: Ms. Reporter, could you read the  
7 question back again.

8 COURT REPORTER: Read back the question?  
9 Sure. Give me one second.

10 (Thereupon, the reporter read the record as  
11 requested.)

12 BY MR. HUDSON:

13 Q. Yes or no?

14 A. I don't know.

15 Q. Do you have any evidence that Mr. Costantini  
16 agreed to personally repay you the money that you loaned  
17 to Capital Force?

18 THE INTERPRETER: You want yes or no response,  
19 or how do you want it?

20 MR. HUDSON: However you want to give it.

21 THE WITNESS: The -- the thing that happened  
22 when I stopped receiving the money, or I was not  
23 able to withdraw the money, I had a health problem  
24 that I had a panic attack and a loss of hearing.  
25 And because of that, my dad called Matias on the

1 phone. They spoke twice for a long time. And  
2 Matias always responded with tranquility that  
3 everything had already been thought of, and  
4 everything was going to be paid. It was  
5 transmitting tranquility.

6 BY MR. HUDSON:

7 Q. Did Juan -- I need you to answer this question  
8 yes or no. Did Juan Cruz Talia Brown ever promise to  
9 personally repay you the money you loaned to Capital  
10 Force?

11 A. No.

12 Q. I need you to answer this question yes or no.  
13 Did Jonathan Culley ever personally agree to repay you  
14 any of the money that your company loaned to Capital  
15 Force?

16 A. No.

17 Q. I need you to answer this question yes or no.  
18 Did Juan Cruz Talia Brown ever make any representations  
19 to you of any kind about the deal Where Meltorme loaned  
20 Capital Force \$180,000? Cruz Talia Brown?

21 A. Juan Cruz, no.

22 Q. Did Jonathan Culley ever make any  
23 representations to you about Meltorme's loan to Capital  
24 Force; yes or no?

25 A. No.

1 Q. Other than the presentation that Matias made  
2 to you in the Brickell office when you met him in  
3 person, did you rely on anything else when deciding to  
4 make your loan to Capital Force?

5 MR. VAZQUEZ: Object to the form of the  
6 question.

7 BY MR. HUDSON:

8 Q. You can answer.

9 A. I did not understand the question well, but I  
10 would like to add something.

11 Q. No.

12 MR. VAZQUEZ: No. Just please answer the --  
13 let him rephrase the question and answer.

14 BY MR. HUDSON:

15 Q. At the meeting with Matias, you said they  
16 showed you information on a screen, correct?

17 A. Yes.

18 Q. Were you given that information in any form  
19 other than being shown it on a screen?

20 A. I don't remember.

21 Q. Okay. What were you shown on the screen?

22 A. That I was investing in an incredible business  
23 with zero risk.

24 Q. Do you recall what the prevailing  
25 international interest rates were in January of 2020?

1 MR. VAZQUEZ: Object to the form of the  
2 question.

3 THE WITNESS: I don't remember.

4 BY MR. HUDSON:

5 Q. You know what the prime rate is?

6 A. I don't understand the question.

7 Q. You've never heard of the expression, "the  
8 prime rate of interest"?

9 A. I don't know the question.

10 Q. Do you know what Treasury bills are?

11 MR. VAZQUEZ: Object to the form of the  
12 question.

13 BY MR. HUDSON:

14 Q. Yes or no. Do you know what Treasury bills  
15 are?

16 MR. VAZQUEZ: And for the record, U.S.  
17 Treasury bills?

18 THE WITNESS: If you want to explain to me  
19 what that is, nope.

20 BY MR. HUDSON:

21 Q. I just want to know if you know what it is.  
22 Do banks in Argentina pay interest on accounts?

23 A. Fixed term or buying bonds?

24 Q. Well, bonds typically have a fixed term. But  
25 on an account, on a general savings account or checking

1 account in Argentina, what would the rate have been that  
2 bank would have paid you on that money in January of  
3 2020?

4 A. Argentina was never a secure country. That's  
5 why I invested in the U.S.

6 Q. Well, to cut this short, the prevailing rate  
7 of interest on a safe investment in January of 2022, for  
8 instance, a Treasury, a United States Treasury bill,  
9 which is guaranteed by the federal government, was two  
10 percent. And typically, as interest rates go up, they  
11 go up because there's additional risk. So the interest  
12 rate that you were promised, ten percent, was five times  
13 what the world believes would have been the return on a,  
14 quote, "safe investment."

15 MR. VAZQUEZ: Okay. If there is a question,  
16 I'll object to the form.

17 BY MR. HUDSON:

18 Q. So did you really believe that you were  
19 getting five times the market rate interest on a risk-  
20 free investment?

21 A. Well, that's what Matias Costantini explained  
22 to me, looking straight into my eyes, that this was the  
23 rate that he was going to pay and without any risk. And  
24 had it been otherwise, I would not have gotten -- paid  
25 the investment.

1 Q. How do you think COVID impacted businesses  
2 around the world?

3 MR. VAZQUEZ: Object to the form of the  
4 question.

5 THE WITNESS: Looking at -- looking at this  
6 from the standpoint of my investment -- so the car  
7 --

8 THE INTERPRETER: Interpreter needs  
9 clarification. Okay.

10 THE WITNESS: So -- so the -- the cars that  
11 were a guarantee, they went up exponentially and  
12 beyond that, the U.S. Government -- Capital Force  
13 for the context. The U.S. Government would  
14 provide companies with money such as Capital Force  
15 because of that international context.

16 BY MR. HUDSON:

17 Q. How much money did the United States  
18 government give Capital Force?

19 MR. VAZQUEZ: Object to the form of the  
20 question.

21 MR. HUDSON: What's wrong with that?

22 MR. VAZQUEZ: Which entity within the Capital  
23 Force Group?

24 THE WITNESS: Well, I don't know how much that  
25 might -- might have been, but they were saying



1 everything is going well, you know, everything is  
2 going well. And that's what they would relay to  
3 me.

4 BY MR. HUDSON:

5 Q. Tell me what it was Capital Force was using  
6 the money for?

7 A. In real terms, I don't know what they might  
8 have used the money for, but what they were saying is  
9 that they were going to use the money to loan to  
10 individuals so they could buy a car.

11 Q. And did you understand those individuals to be  
12 lower income individuals with questionable credit  
13 ratings?

14 A. I don't know that, but what really draws my  
15 attention is, why didn't they stop their operations  
16 before if that was the case and because of -- they ended  
17 up using all the capital.

18 Q. Do you understand that the operations  
19 regarding the actual loans were run by a company called  
20 VSC and not Capital Force?

21 A. They never let me know that.

22 Q. Okay. Well, that was in all of the materials  
23 that they provided to anybody. So you must not have  
24 received those materials, correct?

25 MR. VAZQUEZ: Object to the form of the

1 question.

2 BY MR. HUDSON:

3 Q. You can answer.

4 A. I only based myself on what Matias said to me.

5 Q. Okay. And did Matias tell you that he was the  
6 expert in subprime automobile lending?

7 A. He told me he was an expert in finances who  
8 had worked for Merrill Lynch. And that to me said that  
9 he would be good at managing the money. He wasn't going  
10 to do it badly.

11 Q. Okay. So let's be clear, all of the materials  
12 that any, what you would call investor, including you  
13 were given contained information that said that a  
14 different company was running all of the day-to-day  
15 operations of the automobile financing operation.

16 Earlier you testified that you didn't recall  
17 if you received any of the materials that you were shown  
18 on the screen. Now that I've informed you of some of  
19 the information that was in some of that, some of those  
20 materials, does it help you remember whether you ever  
21 received those materials or not?

22 A. I gave the money to Capital Force, never to  
23 Vehicle --

24 Q. Solutions.

25 A. Solutions. And that -- that's what was

1 mentioned when I spoke with Matias.

2 Q. Okay. Yeah. Did you ever -- do you have any  
3 recollection of ever receiving any written materials  
4 from anybody about this investment?

5 A. No.

6 Q. So the only thing that you relied on -- I need  
7 you to answer this, yes or no. The only thing that you  
8 relied on were the representations made by Matias  
9 Costantini, correct?

10 A. Yes.

11 Q. Did you ever hire a lawyer to help you with  
12 this transaction?

13 A. Well, when they did not fulfill the terms.

14 Q. No. Before the notes were signed and before  
15 the money was advanced, did you hire a lawyer to help  
16 you with this?

17 A. No.

18 Q. So now, the only representations that you  
19 relied on were the verbal representations of Mr.  
20 Costantini. So now we have a baseline, agreed?

21 MR. VAZQUEZ: Object to the form of the  
22 question.

23 You can answer, sir.

24 THE WITNESS: So I base myself on the  
25 conversation with Matias Costantini. You know, we

1 had a talk, we got together, and we had a talk and  
2 there it was said that there was going to be there  
3 was not going to be any risk. And additionally,  
4 also with what Diego Gomez said about investing  
5 there.

6 BY MR. HUDSON:

7 Q. Why didn't you sue Diego Gomez?

8 A. They -- he was fired.

9 Q. Doesn't mean you can't sue him. Do you know  
10 what fraud is?

11 A. It -- it sounds to me as if it's tricking  
12 someone and diverting other funds that belong to  
13 somebody else.

14 Q. You are suing my three clients for fraud.

15 MR. VAZQUEZ: Object to the form of the  
16 question.

17 BY MR. HUDSON:

18 Q. In the United States, that means that they  
19 told you something that they knew when they told you was  
20 untrue that caused you to give them money, and you lost  
21 that money?

22 A. Yes. And I'm not the only one. Several other  
23 individuals went through the same thing.

24 Q. Actually, I've taken the deposition of every  
25 other Plaintiff, except you, and not one has had any

1 evidence of fraud so far.

2 MR. VAZQUEZ: If that's a question, I'll  
3 object to the form.

4 BY MR. HUDSON:

5 Q. So let's find out what statements Matias  
6 Costantini made to you that --

7 MR. VAZQUEZ: I truly apologize to interrupt  
8 you. I really have to go to the restroom and just  
9 give me 30 seconds. I've been waiting --

10 MR. HUDSON: --

11 MR. VAZQUEZ: -- okay? It's not in the middle  
12 of an answer, so --

13 COURT REPORTER: Okay. Off the record. 2:39  
14 p.m.

15 (Off Record.)

16 COURT REPORTER: 2:42 p.m. We're back on the  
17 record.

18 BY MR. HUDSON:

19 Q. Do you know what a Ponzi scheme is?

20 A. Yes.

21 Q. What is it?

22 A. To pay interest to the investments from money  
23 paid by other investors rather than from money made out  
24 of genuine investments.

25 Q. Okay. And what evidence do you have that any

1 of the Capital Force Group did that?

2 A. They were taking in money, right to the very  
3 end, even when the business was going badly, and they  
4 knew they were not going to be able to return that.

5 Q. That wasn't my question. My question is: What  
6 evidence do you have that they were taking money from  
7 one creditor and using it to pay another creditor?

8 A. That's in the investigations.

9 Q. Okay. What investigations?

10 A. The ones that we did collectively, all of the  
11 affected parties, with the attorney.

12 Q. What does that mean?

13 A. When -- when the moment comes, the evidence  
14 will be shown.

15 Q. No. I'm entitled to the evidence today. Tell  
16 me specifically what evidence you have seen or have that  
17 my clients paid creditors with money from other  
18 creditors?

19 A. Well, how did they ever -- how were they ever  
20 able to pay interest between 2020 and 2021 if the  
21 business was already going badly, if not by taking money  
22 from one investor and take -- paying it to another?

23 Q. Answer the following question yes or no: Do  
24 you personally have any evidence that my clients --  
25 strike that.

1 Do you personally have any evidence that  
2 Capital Force or any of the Capital Force entities use  
3 creditor money to pay other creditors?

4 MR. VAZQUEZ: Object to form.

5 THE WITNESS: I cannot respond yes or no  
6 because I don't know.

7 BY MR. HUDSON:

8 Q. So as we sit here today, you have no evidence  
9 that my clients, or I'm sorry, that Capital Force used  
10 money from one creditor to pay another. You personally  
11 have no such evidence, correct? Yes or no?

12 MR. VAZQUEZ: Object to form.

13 BY MR. HUDSON:

14 Q. You're under oath.

15 A. There's an article published in a Chilean  
16 outlet that a Chilean fund was paid everything that was  
17 owed to it. How did they ever -- were they ever able --  
18 what did -- what did they do to be able to pay for that?  
19 And simultaneously, all guaranteed collateral and all  
20 the money disappeared?

21 Q. I'm going to move the strike that is  
22 unresponsive.

23 So I want to ask you one more time. I don't  
24 want to have to go to the Judge and ask the Judge to ask  
25 you. So --

1 MR. VAZQUEZ: I'm going to object to this last

2 --

3 BY MR. HUDSON:

4 Q. So --

5 MR. HUDSON: You're just making it worse.

6 MR. VAZQUEZ: I'm telling him to answer. How

7 am I making it worse?

8 BY MR. HUDSON:

9 Q. So please answer my question simply yes or no.

10 As we sit here today --

11 MR. HUDSON: Go ahead.

12 BY MR. HUDSON:

13 Q. -- do you have any evidence other than the

14 article you just referenced that any of the Capital

15 Force entities used creditor money to pay other

16 creditors?

17 MR. VAZQUEZ: Object to form.

18 Please answer the question.

19 BY MR. HUDSON:

20 Q. Yes or no? Yes, you have evidence? Your

21 answer is yes?

22 MR. VAZQUEZ: Object to the form.

23 BY MR. HUDSON:

24 Q. Was your answer yes?

25 MR. VAZQUEZ: Object to form.



1 THE WITNESS: I don't know.

2 BY MR. HUDSON:

3 Q. So I've given you two choices: yes or no. And  
4 your answer is: I don't know, correct?

5 A. I don't understand the question. I don't know  
6 what -- I don't understand what's happening.

7 MR. HUDSON: Put a motion to compel here as  
8 part of the transcript.

9 BY MR. HUDSON:

10 Q. We're going to ask the Judge at some point to  
11 compel you to answer the question directly. And we will  
12 not be able to finish your deposition today because of  
13 that. So you may get to come back to Miami for vacation  
14 in the near future.

15 A. Well, if you can repeat the question, because  
16 I did not understand it --

17 MR. VAZQUEZ: And hold on one second. Note my  
18 objection, okay? That he answered -- my client,  
19 Mr. Ini, on behalf of Meltorme, answered the  
20 question the best he could. And he's now asking to  
21 rephrase the question he didn't understand.

22 MR. HUDSON: I've asked it three times, and  
23 he's avoided me three times. I believe he's  
24 intentionally avoiding the answer, so we'll let the  
25 Judge deal with it.

1 MR. VAZQUEZ: Okay. Note for the record that  
2 I'm requesting that you call the Judge, if we can  
3 at this point, the magistrate, okay? And we take  
4 it up with the magistrate now, considering that he  
5 traveled all the way from Argentina for the second  
6 time.

7 And that the discovery deadline is presently  
8 set for July 1st, and that Plaintiff's Counsel does  
9 not agree to any further extensions of discovery at  
10 this point for any of the parts.

11 BY MR. HUDSON:

12 Q. So earlier we've discussed --

13 MR. VAZQUEZ: Are we calling it off, or are we  
14 going forward?

15 MR. HUDSON: No, we're going forward.

16 MR. VAZQUEZ: Okay.

17 MR. HUDSON: I'm going to get as much as I can  
18 because I may not get another shot at him.

19 BY MR. HUDSON:

20 Q. So we -- earlier we talked about what fraud  
21 is, and we generally agreed that fraud was an  
22 intentional misrepresentation that harmed you. So what  
23 we need to do now is to go through each and every  
24 representation that Matias made to you that you  
25 considered to have been fraudulent when he made it at

1 that meeting in Brickell.

2 So tell me -- start with whichever one you  
3 want.

4 A. The option he gave me of investing and getting  
5 a ten percent return -- interest, that was the option  
6 with no risk. If I wanted to earn more money, for  
7 example, an approximately 20 percent, that would be to  
8 go in as a partner, both in losses or in further gains.

9 So I opted for the option without risk.  
10 Nevertheless -- nevertheless, I only got ten percent  
11 interest for two months, then they reduced it to six,  
12 and then to eight. But if I wanted to earn more, we  
13 also had the option to bring in more investments who  
14 would provide them with more money. And then there he  
15 would give me one -- he could give me one point for each  
16 investor, but I never took anyone.

17 Q. So he gave you a fixed interest option or a  
18 profit option that had a higher rate of return, correct?

19 A. I chose the one that was fixed and without  
20 risk.

21 Q. Understood. And the other option was a profit  
22 option. You would have to share in the profits, but the  
23 profit option had risk, correct?

24 A. That -- that option would've been a greater  
25 profit, but with risk. And I said no to that.

1 Q. You agree that under the option that you  
2 chose, you were never entitled to any profit of Capital  
3 Force, correct, simply a fixed return?

4 A. Force?

5 MR. VAZQUEZ: Object to the form.

6 BY MR. HUDSON:

7 Q. Did he answer?

8 A. Well, the option was to get a fixed rate. But  
9 nevertheless, they unilaterally lowered it.

10 MR. HUDSON: Motion to strike. Unresponsive.

11 MR. VAZQUEZ: What was the question?

12 BY MR. HUDSON:

13 Q. Listen to my question and answer it. Under  
14 the option you selected, you would agree with me that  
15 you were not entitled to any profits of Capital Force,  
16 correct? Answer yes or no.

17 A. Interests or profit?

18 Q. Read the --

19 MR. VAZQUEZ: I'm going to object to the form  
20 of the question.

21 MR. HUDSON: Ms. Reporter, read it back to  
22 him.

23 (Thereupon, the reporter read the record as  
24 requested.)

25 THE WITNESS: I don't understand the question.

1           They were going to give you ten percent in  
2           interest.

3       BY MR. HUDSON:

4           Q.     Which means you're not entitled to any profit,  
5     right? You're only entitled to interest, correct? Yes  
6     or no?

7           MR. VAZQUEZ: I'm going to object -- give me  
8     one second.

9           Did you note my objection?

10          COURT REPORTER: I'm sorry.

11          MR. VAZQUEZ: My objection is that I object as  
12     to the way the question is being asked to -- please  
13     note that I believe Mr. Hudson is raising his  
14     voice, and I ask that he please not do so.

15          MR. HUDSON: And I believe the witness is  
16     being coached and every time the form objection is  
17     made, he's changing his response and his answer. I  
18     also believe that he's being intentionally evasive  
19     and refusing to answer very simple questions.  
20     Magistrate Judge will ultimately make that  
21     decision.

22          Ms. Reporter, read the question back again,  
23     please.

24          MR. VAZQUEZ: Ms. Reporter, for the record --  
25     okay. Let it be noted that the only objections

1           that Gerardo Vazquez as Plaintiff's counsel has  
2           raised have been objections strictly related to the  
3           form of the question.

4           COURT REPORTER:   Okay.   I'm going to read  
5           back.

6           (Thereupon, the reporter read the record as  
7           requested.)

8           THE WITNESS:   Interest.

9           BY MR. HUDSON:

10          Q.    That's not yes or no.

11          A.    Have them explain to me what's the difference  
12          between interest and profits.

13          Q.    Okay.   Let's add that to the motion to compel.  
14          On Page 7 of the complaint in front of you, it's -- no.  
15          It's way in the beginning.   You got to go to the  
16          beginning.

17          A.    Oh, the beginning.

18          Q.    In the lawsuit.   Those are exhibits.

19          A.    Right.   Right.   Right.   Right.   Okay.   So  
20          we're going to Page 7 of the --

21          Q.    Yeah.   There's pages on the bottom -- page  
22          numbers on the bottom.

23          A.    Yeah.   Okay.   7.   All right.   Very good.   6.  
24          7.    There you go.

25          Q.    You don't read English, correct, sir?

1 A. Correct.

2 Q. Okay. In Paragraph number 24, there's an  
3 allegation that the Capital Force entities tricked you  
4 somehow. One of the ways it says they tricked you was  
5 telling you that the money was only going to be used for  
6 purchasing car loans.

7 Do you believe that's one of the ways you were  
8 tricked?

9 A. One of the ways.

10 Q. Okay. And what evidence do you have today  
11 that they used any of your money for buying anything  
12 other than car loans?

13 A. Through the bank statements and the financial  
14 transactions -- banking financial transactions that my  
15 attorney was able to get.

16 Q. So you've never seen those bank statements or  
17 other documents that you're referencing, correct?

18 A. No. My attorney.

19 Q. On the next page, Paragraph 28. In 28, you  
20 allege, through your lawyer, that my clients concealed  
21 material facts.

22 As you sit here today, what material facts did  
23 they conceal from you before you funded your \$180,000?

24 A. That the business was not secure, and it was  
25 doing badly.

1 Q. What evidence do you have that the business  
2 was doing badly in January of 2020?

3 A. Telephone conversations that my dad had with  
4 Matias.

5 Q. You said the telephone conversations were much  
6 later when they didn't pay you back?

7 A. Yes.

8 Q. I'm asking you: Before you put the original  
9 money in, what material facts did they admit --

10 A. No. Back then it was going fantastically.

11 Q. Okay. So in January 20 of '20, the business  
12 were doing okay, right?

13 A. Yeah. According to Matias and Diego,  
14 excellent.

15 Q. Would it surprise you that the tax returns for  
16 2019 show that Capital Force entities were very  
17 profitable?

18 MR. VAZQUEZ: I'm going to object to the form  
19 of the question.

20 BY MR. HUDSON:

21 Q. You can answer.

22 A. If it would surprise me? That is an emotion.  
23 No. No. That's what they said. That would not  
24 surprise me.

25 Q. When do you think the companies began to have



1 financial trouble?

2 A. I don't know. But if they're having financial  
3 problems, you know, they -- they stop the ball, and they  
4 talk with the investors. The money doesn't disappear  
5 out of the blue.

6 MR. VAZQUEZ: Can we go off the record one  
7 second? And what -- I'm going to just tell him to  
8 refocus a little bit on trying to listen to the  
9 question, ask and answer the question.

10 MR. HUDSON: Okay.

11 MR. VAZQUEZ: Because I understand --

12 MR. HUDSON: Why don't you take him outside  
13 and have a conversation?

14 MR. VAZQUEZ: I don't mind saying it here.

15 MR. HUDSON: Okay.

16 MR. VAZQUEZ: Whatever --

17 COURT REPORTER: So let me go off record.

18 THE INTERPRETER: Yeah. We're off the record.

19 MR. VAZQUEZ: --

20 COURT REPORTER: Off the record.

21 (Off Record.)

22 COURT REPORTER: Back on the record. 3:13

23 p.m.

24 BY MR. HUDSON:

25 Q. Okay. So back to Paragraph 28 of Exhibit 1.

1 Are you alleging that my clients concealed material  
2 facts from you about the financial condition of the  
3 company prior to your investment?

4 A. No.

5 Q. Okay. Where did you -- strike that.

6 Do you know where you wired the \$180,000?

7 A. To the escrow account that they provided me  
8 with.

9 Q. And that was an attorney's escrow account,  
10 correct?

11 A. Yes.

12 Q. Did you ever meet that lawyer?

13 A. No.

14 Q. Did you ever communicate with that lawyer in  
15 any fashion?

16 A. No.

17 Q. Did you ever pay that lawyer any money?

18 A. No.

19 Q. What other misrepresentations do you believe  
20 Matias Costantini made to you prior to your advancing  
21 your \$180,000 loan through Meltorme?

22 A. I don't recall.

23 Q. Turn to Page 13. Have you ever seen that flow  
24 chart before?

25 A. I think the day that I got together with

1 Matias, this is what they put on the screen. You know,  
2 I'm not sure, but I think this is the one.

3 Q. That's one of the pages of the PowerPoint you  
4 were seen shown, correct?

5 A. Among many -- many pages. I think this was  
6 one of them because of the format. It has.

7 Q. If you look at this flow chart, you'll see  
8 three blue balloons on the left and three blue balloons  
9 toward the right. I just pointed to them.

10 Do you see those?

11 A. Yes.

12 Q. Okay. Underneath the three on the right, it  
13 says, quote, "VSC acquires notes originated according to  
14 VSC and CFF's underwriting policies," close quote. See  
15 that?

16 And below that in a rectangle, there are the  
17 words, quote, "Vehicle Solutions Corporation" and below  
18 that, "VSC," in parentheses.

19 Do you know what any of that means?

20 A. I suppose this might be -- be the partner that  
21 Capital Force had.

22 Q. Did you ask any questions about that when you  
23 were shown this flow chart?

24 A. No. I only based myself on Capital Force.

25 Q. But you were aware then prior to your

1 investment that it had a partner VSC, correct?

2 A. That was not focused on.

3 Q. By you?

4 A. The party? No. No.

5 Q. Next page, Page 51 -- I'm sorry. Paragraph  
6 51, Page 14. The last sentence in Paragraph 51 says,  
7 "In reality, the actual default rate was actually close  
8 to 30 percent."

9 As you sit here today, do you have any  
10 information or evidence to support that statement?

11 A. No. No.

12 Q. Go to Paragraph 54 on that same page. I am  
13 going to read it. Quote, "Costantini and Brown also  
14 represented to investors that their principle and  
15 interest payments were safe, guaranteed, and protected  
16 by the profit Capital Force generated from high interest  
17 rates," parenthesis, "in excess of 20 percent," close  
18 parenthesis, "Capital Force charged car loan borrowers."

19 A. Yes.

20 Q. As you sit here today, do you have any  
21 evidence that statement is untrue?

22 A. No. No.

23 Q. As you sit here today, do you have any  
24 evidence that Capital Force used the money from  
25 creditors to fund luxury vacations, ski trips, buying

1 boats, or exotic luxury cars?

2 A. Because the -- no. I don't have that  
3 information. I don't have that now.

4 Q. Have you ever personally seen any such  
5 information?

6 A. No. No.

7 Q. Other than the article that you referenced in,  
8 I believe it was either an Argentinian or Chilean paper,  
9 do you have any evidence that Capital Force F1 or the  
10 Chileans were paid 100 percent of their investment?

11 A. Any other evidence, no.

12 Q. Okay. Do you know what the term collateral  
13 means?

14 A. Could that be just, like, a backing and a  
15 guarantee.

16 Q. That's one way to look at it. Were you  
17 promised collateral for your loan from Meltorme?

18 A. Cars.

19 Q. Okay. Were you given that collateral?

20 A. I asked for it, but no.

21 Q. Did they tell you why they didn't give it to  
22 you?

23 A. No. No.

24 Q. One of the allegations in your lawsuit is that  
25 Capital Force used your collateral to pay off other

1 creditors. Do you have any evidence of that as you sit  
2 here today?

3 A. Not here.

4 Q. Anywhere?

5 A. No. More than the notes that I mentioned  
6 before, no.

7 Q. Have you personally ever seen any evidence  
8 that my clients or Capital Force sold any collateral  
9 that belonged to you to anybody else?

10 A. No. No evidence.

11 Q. You were in Argentina when COVID began,  
12 correct?

13 A. In March, I was in Argentina.

14 Q. Okay. And did you leave Argentina from the  
15 beginning of March of 2020 to the end of 2020?

16 A. That was prohibited. No.

17 Q. Right. And were people in Argentina prevented  
18 from going to work for most of 2020?

19 A. Home office.

20 Q. Most people worked from home, correct? Do you  
21 think it was any different in the United States?

22 A. The lockdown in the U.S. lasted a lot less  
23 than in Argentina.

24 Q. When do you recall the lockdown began in the  
25 United States?

1           A.     They delayed it as long as possible, and they  
2     lifted it as soon as possible, but I don't recall the  
3     dates.

4           Q.     Okay.   Would you agree it was several months?

5                   MR. VAZQUEZ:   Object to the form.

6                   THE WITNESS:   I don't know what several months  
7     are.

8     BY MR. HUDSON:

9           Q.     Okay.

10          A.     Yeah.

11          Q.     Would you agree that people couldn't go to  
12     work in the United States because they couldn't use  
13     their cars to go to work in the United States, at least  
14     at some point during 2020?

15          A.     At some point, I suppose, yes, but I don't  
16     know for how long.

17          Q.     Okay.   And if the people that were buying  
18     these car loans were lower income folks, do you think  
19     they would spend money on buying food or paying their  
20     car loan?

21          A.     Well, that depends on each person.

22          Q.     So there's a circumstance that if you were a  
23     lower income person, that you would make your car  
24     payment and not pay for food for your family and your  
25     kids?

1           A.     I can't imagine that because I would never ask  
2     for a loan.

3                   MR. HUDSON:   Guess I'll have to talk to his  
4     girlfriend.

5     BY MR. HUDSON:

6           Q.     And do you think that the demand for cars  
7     increased or decreased at the beginning of COVID?

8           A.     Well, I imagine that in 2020 it went down, and  
9     then they went back up in 2021 because they had stopped  
10    making cars in 2020.

11          Q.     I would agree with you.   That's inconsistent  
12    with something you said earlier, though.   Right.   Turn  
13    to Page 45.   On Page 45, beginning at the bottom and  
14    going over to the next page is a discussion about a  
15    phone call that you had with Costantini in December of  
16    2019.   And the next page, Paragraph 183, has a list of  
17    representations that you say were made during that phone  
18    call.   So let's go through them briefly.

19                   183A, "Capital Force had a longstanding track  
20    record of being extremely profitable and maintained  
21    ample reserves in the extremely unlikely event of any  
22    short falls."

23                   You understand that?

24          A.     Yes.

25          Q.     Okay.   And I think we talked about, maybe 20



1 minutes ago, that you believe that Capital Force was  
2 profitable at least through early 2020, correct?

3 A. Based on this conversation, yes.

4 Q. Right. And you have no evidence to show that  
5 it wasn't profitable in either December of 2019 or  
6 January 2020, correct?

7 A. Of course I don't have any evidence.

8 Q. Okay. The next statement is, "Meltorme's  
9 investment would be used exclusively to purchase car  
10 loans, which would be acquired by Capital Force, and  
11 thereafter, pledged in favor of Meltorme as collateral  
12 for Meltorme's investment."

13 Understand that?

14 A. Yes.

15 Q. And we've talked a little bit about that  
16 already today as well, correct?

17 A. Yes.

18 Q. And as you sit here today, you have no  
19 evidence that that statement was untrue when made,  
20 correct?

21 A. I have no evidence.

22 Q. Do you know what negligence is?

23 A. Yes.

24 Q. What is it?

25 A. Negligence, I suppose, is to do something bad

1 without the intent of doing so or because of incapacity.

2 Q. Okay. That's fair. Do you think it's more  
3 likely that my clients were negligent than intentionally  
4 defrauded you?

5 A. I don't have any evidence of that.

6 MR. VAZQUEZ: That was -- I don't know. Let's  
7 rephrase the question. Okay. Just to make sure --

8 BY MR. HUDSON:

9 Q. Looking back two or three years later today,  
10 isn't it more likely that my clients may have ultimately  
11 run the companies poorly because of COVID as opposed to  
12 intentionally defrauding the creditors?

13 MR. VAZQUEZ: I'm going to object to the form  
14 of the question.

15 Please answer.

16 THE WITNESS: I don't know.

17 MR. HUDSON: All right. Mr. Interpreter,  
18 we're going to try to speed this up. Instead of me  
19 reading this into the record, I'm just going to ask  
20 you to read to him 183C, as in Charlie. Tell me  
21 when you're done.

22 THE INTERPRETER: Okay. Interpreter will read  
23 it into Spanish, 183C.

24 MR. HUDSON: Yes. Yes.

25 BY MR. HUDSON:

1 Q. You understand that?

2 A. So before doing any kind of operation, they --  
3 they would really take -- take a lot of care.

4 Q. Do you have any evidence, as you sit here  
5 today, that they -- that this statement was untrue when  
6 made at the end of '19 or the beginning of 2020?

7 A. No. Because I wasn't in the business. I  
8 don't know that.

9 Q. Okay. So 183D, as in David, "They represented  
10 that they had over 20 years of experience in the auto  
11 finance industry." Was that representation made to you?

12 A. I -- I don't remember, but that -- that they  
13 were experts in finances. I don't know if it was  
14 automobiles or something else.

15 Q. Okay.

16 A. Yeah.

17 MR. HUDSON: The next one. Go ahead.

18 THE INTERPRETER: Interpreter will read 183D -  
19 - E. E. E.

20 BY MR. HUDSON:

21 Q. E. E.

22 A. Yes.

23 Q. Do you remember that representation being  
24 made?

25 A. Yes.

1 Q. Do you have any evidence that it was untrue?

2 A. No.

3 MR. HUDSON: Next page. Please read him  
4 number F.

5 BY MR. HUDSON:

6 Q. Was that representation made to you by Matias  
7 before you funded?

8 A. I don't remember.

9 Q. Okay. Do you have any evidence that that  
10 statement was untrue, when made?

11 A. No.

12 MR. HUDSON: Okay. Please read him -- or  
13 translate G.

14 BY MR. HUDSON:

15 Q. Do you ever recall that representation being  
16 made?

17 A. No.

18 Q. The information that you were shown on the  
19 screen in Miami in January of 2020, was it in English,  
20 or Spanish?

21 A. It was in English.

22 Q. So you were less comfortable with that than  
23 what -- it had been in Spanish, correct?

24 A. Matias's personality convinced me.

25 Q. No. I think you've been pretty consistent in

1 saying, essentially, you relied on what Matias told you,  
2 verbally, on that phone call, and in that meeting, as  
3 opposed to anything else.

4 Is that a fair statement?

5 A. Yes. I trusted him.

6 Q. Do you understand that a representation made  
7 after you funded cannot be a basis for fraud?

8 A. What was that?

9 MR. HUDSON: Ms. Reporter? We're on --

10 (Thereupon, the reporter read the record as  
11 requested.)

12 THE WITNESS: I didn't know that.

13 BY MR. HUDSON:

14 Q. Well, think about it. If you've already given  
15 the money to me, I can't harm you anymore because you've  
16 already lost your money -- this is why I think  
17 negligence is more likely to be the explanation, here.  
18 Fraud requires the misrepresentation to be the cause of  
19 you giving me the money.

20 A. But at that time, I was trusting. In 2020,  
21 there wasn't any problem. And that's why, in 2021, I  
22 renewed, after all of the talks.

23 Q. But you had already funded the money. The  
24 renewal is meaningless because you'd already funded the  
25 money.

1           A.     I left it there so that they could continue  
2     paying me interest.

3           Q.     So did everybody else. And by the way, the  
4     Chileans only received about 60 percent of their money  
5     back, and they spent two years doing due diligence on  
6     the company.

7           A.     The problem was in 2022, when everything  
8     became known at.

9           Q.     We agree. You're aware that we're suing our  
10    partner for fraud, correct?

11          A.     Yes.

12          Q.     Do you know what the ABCs are? ABC. When we  
13    talk about the ABCs, you know what they -- what that  
14    means?

15          A.     I believe it's -- that would be a -- a third,  
16    indirect company that deals with liquidating companies.

17          Q.     Close. In 2020 -- late 2021, or early 2022,  
18    my clients became concerned with the truthfulness of the  
19    information they were getting from their partners. The  
20    partner handled all the money and all the cars, and we  
21    would get reports. In April of 2020, we were told there  
22    were \$16 million worth of assets remaining.

23          A.     How much?

24          Q.     16 million. In the late summer of 2022,  
25    because my clients were concerned, they decided to file

1 the ABC proceedings. They did so because they wanted  
2 the creditors, including you, to feel that there was a  
3 third-party professional trying to get as much money --  
4 to pay everybody back.

5 In September of 2022, when we filed the ABCs,  
6 our partner told us the assets were now only \$3 million.  
7 The person in charge of the ABCs said there were zero  
8 assets left when we filed the ABC. Obviously, somebody  
9 was lying. We have concerns the ABC did not do its job,  
10 and we have concerns that our client, our partner,  
11 defrauded us, and that's why we are suing them.

12 Are you aware of any of that?

13 A. Well, whatever is done to recover the money,  
14 that would be well done.

15 Q. We agree.

16 MR. HUDSON: I am not going to bother with the  
17 admissions.

18 MR. VAZQUEZ: One minute to go to the  
19 restroom?

20 MR. HUDSON: Yeah. Let's take a few minutes.  
21 I'm almost done.

22 COURT REPORTER: Off the record. 3:36 p.m.  
23 (Off record.)

24 COURT REPORTER: 4:03 p.m. We're back on the  
25 record.

1 MR. HUDSON: Did you tell him, or do I need to  
2 say it again?

3 Subject to the questions and the motion to  
4 Compel, we're done for the day.

5 MR. VAZQUEZ: Okay. And for the record, once  
6 again, my client has traveled from Argentina for  
7 the second time. He was the corporate  
8 representative for the plaintiff, Meltorme, and it  
9 is now 4:04 p.m. in the afternoon. And Mr. Ini is  
10 available until 5:00 to answer any questions or  
11 have any questions asked again on behalf of  
12 individual defendants. So if Mr. Hudson is taking  
13 a position that certain questions were not answered  
14 by Mr. Ini, I encourage Mr. Hudson to re-ask those  
15 questions at this moment.

16 MR. HUDSON: Ms. Reporter, I asked you to mark  
17 those. Can you find them?

18 (Thereupon, the reporter played back the  
19 record as requested.)

20 COURT REPORTER: Is that where we want to  
21 start?

22 MR. HUDSON: Yeah. Let's do that one. Ready?

23 COURT REPORTER: Yes.

24 MR. HUDSON: Okay. Go ahead and tell him --  
25 read the question, please. Yeah. I want you to



1 read it not -- to refresh my recollection. Just  
2 read it from the record so we have the exact  
3 question.

4 COURT REPORTER: Okay. Hold on here. Okay.

5 "So as we sit here today, you have no evidence  
6 that Capital Force used money from one creditor to  
7 pay another? You personally have no such evidence,  
8 correct?"

9 (Thereupon, the reporter read the record as  
10 requested.)

11 THE WITNESS: No.

12 MR. HUDSON: One down.

13 COURT REPORTER: The next one after that, you  
14 are asking, "Please answer my question. Yes or no?  
15 As we sit here today, do you have any evidence  
16 other than the article that you just referenced,  
17 that any of the Capital Force entities use  
18 creditors or monies to pay other creditors?"

19 (Thereupon, the reporter read the record as  
20 requested.)

21 MR. HUDSON: I don't think -- no. There was  
22 another --

23 COURT REPORTER: Another?

24 MR. HUDSON: I'm okay with that because he's  
25 answered that. There was another one with a

1 different subject matter.

2 THE WITNESS: Possibly before.

3 COURT REPORTER: Maybe a little before.

4 MR. HUDSON: I made a little note. But --  
5 you're looking for motion to compel?

6 COURT REPORTER: Yeah. Shortly --

7 MR. HUDSON: That's probably the way -- best -  
8 -

9 COURT REPORTER: But that's within the same  
10 line of questioning.

11 MR. HUDSON: Right. But there was another one  
12 with a different line that I added. I think that  
13 was the first one because I started with the Ponzi  
14 scheme earlier.

15 COURT REPORTER: I'm going to have to play it  
16 just so I can.

17 MR. HUDSON: That's fine. Or look up "add  
18 that" because I remember saying "add that" to the -  
19 -

20 THE INTERPRETER: I wrote down Ponzi here. I  
21 want to find that.

22 (Thereupon, the reporter played back the  
23 record as requested.)

24 COURT REPORTER: I think it was regarding the  
25 profits when you started talking about --

1 MR. HUDSON: Yes. That's exactly what it was.  
2 All right. I can try to re-ask it if you can't  
3 find it. I know what it is now.

4 COURT REPORTER: Can I just read the last?

5 MR. HUDSON: Yeah. Go ahead.

6 COURT REPORTER: It says, "Well, the options  
7 was to get a fixed rate, but nevertheless, they  
8 were unlikely lowered." Hold on. Let me play it.

9 (Thereupon, the reporter read the record as  
10 requested.)

11 MR. HUDSON: I think that's his answer.

12 COURT REPORTER: Yeah. That was his answer.

13 MR. HUDSON: Yeah.

14 COURT REPORTER: Yeah. That was the question.

15 MR. HUDSON: You were never entitled to  
16 profit, just fixed rate. So you want to read it,  
17 or do you want me to ask it?

18 COURT REPORTER: Oh, I'm sorry. I thought you  
19 were just asking.

20 MR. HUDSON: No. I'll ask it. I'll ask it.

21 COURT REPORTER: Okay.

22 MR. HUDSON: Let's go. Ready?

23 BY MR. HUDSON:

24 Q. You've testified that you were given two  
25 options by Mr. Costantini, a ten percent fixed rate or a

1 higher rate with more risk, correct?

2 A. Yes.

3 Q. And you opted for the fixed rate, correct?

4 A. Yes.

5 Q. And therefore, you were not entitled to any  
6 profit participation from my clients or CF, correct?

7 A. Yes.

8 MR. HUDSON: Okay. We're done. You don't  
9 want to come back to Miami and see me again in a  
10 week?

11 We're off the record.

12 THE WITNESS: If we do --

13 COURT REPORTER: Before --

14 THE WITNESS: -- some show together.

15 COURT REPORTER: -- I just need to do some  
16 housekeeping.

17 This concludes today's deposition.

18 Will the witness read or waive?

19 MR. VAZQUEZ: Waive.

20 COURT REPORTER: And will there be any orders  
21 at this time?

22 MR. HUDSON: Me.

23 COURT REPORTER: Is standard delivery okay?

24 MR. VAZQUEZ: No. I'll give it --

25 MR. HUDSON: Standard for the moment. Yeah.

1 COURT REPORTER: And just to --

2 MR. HUDSON: We keep the exhibits.

3 COURT REPORTER: Okay.

4 MR. HUDSON: And we're -- we'll provide you  
5 with a subpoena.

6 COURT REPORTER: All right. And we do have  
7 one --

8 MR. VAZQUEZ: You want my binder?

9 COURT REPORTER: -- exhibit. This whole --  
10 this is going to be one exhibit?

11 MR. HUDSON: Yeah. I think it was just this  
12 one.

13 COURT REPORTER: Okay.

14 MR. VAZQUEZ: Phil, you want the binder?

15 MR. HUDSON: No. You can take it.

16 MR. VAZQUEZ: Okay.

17 MR. HUDSON: It's just Carlos I was giving a  
18 hard time.

19 COURT REPORTER: Okay. Off the record at 4:14  
20 p.m.

21 (Thereupon, the deposition was concluded at  
22 4:14 p.m.)

23 (Reading and signing of the deposition  
24 transcript was waived.)

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CERTIFICATE OF OATH

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE

I, Jasmine Mercedes, Court Reporter, Notary  
Public, State of Florida, certify that Andres Ini,  
personally appeared before me on the 26th day of  
June 2024, and was duly sworn.

Signed this 13th day of July 2024.

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Jasmine Mercedes, Court Reporter  
Notary Public, State of Florida  
Commission No.: HH 231847  
Commission Expires: March 11, 2026

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CERTIFICATE OF REPORTER

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE

I, Jasmine Mercedes, Court Reporter, certify that I was authorized to and did report the Deposition of Andres Ini; that a review of the transcript was waived; and that the transcript is a true and correct record of my notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 13th day of July 2024.

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Jasmine Mercedes, Court Reporter

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